

EXHIBIT 2

WILMERHALE

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August 13, 2024

Damian Williams
United States Attorney
United States Attorney's Office
Southern District of New York
26 Federal Plaza, 37th Floor
New York, New York 10278

Re: Eric Adams

Dear Mr. Williams,

Two months ago, we detailed serious and repeated leaks of confidential grand jury information about the office's investigation of the Adams 2021 Campaign and requested confirmation that an investigation into the source of past leaks had been opened and measures were being taken to prevent future leaks. To date, we have received no response. Unfortunately, we learned recently that yet another damaging leak has occurred and that members of the media intend to report on the grand jury subpoenas the office issued last month. In addition, we were just informed that the media has become aware of details relating to our private meeting with the office on June 28, 2024.

As we have expressed repeatedly since last November, neither the Mayor nor we wish to comment on the investigation publicly. But the continuing leaks of confidential grand jury information have been met by silence and continue to harm our client. We are extremely troubled and disappointed that details of a confidential grand jury investigation of such unique sensitivity continue to be publicly reported and that the office has elected not to respond to our concerns.

It has been nearly nine months since the FBI seized the Mayor's devices from him on the street, creating the public perception that he is a target of the investigation. Since then, the office has shared no evidence of criminal misconduct by the Mayor. Meanwhile, we have cooperated fully with your investigation; we have promptly answered every request the office has made for information; and we have provided clear evidence that undermines the reported theories of federal prosecution as to the Mayor. Yet now the office appears to be opening new lines of inquiry well beyond the topics we were asked to present on before the subpoenas were issued.

As part of our June 28 presentation and subsequent document productions, we have

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provided the office with clear evidence that the Mayor did not knowingly participate in a scheme to receive improper foreign or straw donor contributions from the government of Turkey or anyone else or engage in any type of quid pro quo with those affiliated with the government of Turkey or anyone else. That evidence includes:

- The Mayor's direction on November 3, 2023 to immediately report the suspicious conduct of Rana Abbasova to the New York City Department of Investigation ("DOI");
- The November 2, 2023 interview of Ms. Abbasova by lawyers for the City during which we understand she provided exculpatory statements about the Mayor and the Campaign on these topics;
- The August 29, 2021 group text message chain in which Ms. Abbasova was provided with a campaign donation link for the Turkish community after which the Mayor stated: "Rana please be aware We [sic] can't take any money from people who are not US citizens";
- Evidence that the Turkish Consul General never engaged in any improper conduct with the Mayor or his campaign;
- Communication records from Commissioner Daniel Nigro that demonstrate the Mayor's communications with the Commissioner about the Turkish consulate were not improper;
- Records reflecting New York City Conflict of Interests Board approval of the Mayor's two official trips to Turkey as Brooklyn Borough President, including approval of his use of a business class seat;
- The absence of any suspicious paperwork submitted by donors associated with KSK Construction Group or Bay Atlantic University to the Campaign, and the absence of any suspicious communications with those donors;
- Evidence of the Brooklyn Borough President office's extensive ties with the Turkish community prior to the Mayor's tenure in that office, and the relationships within that community the Mayor inherited from his predecessor;
- Documents and communications relating to the Mayor's personal travel to Turkey and other countries; and

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- Evidence of the Mayor's active and appropriate relationships with the Consul Generals of countries other than Turkey while Brooklyn Borough President and Mayor.

Since the day he learned of the investigation, the Mayor has cooperated fully and directed those around him to do the same. As you know, the day after the investigation became public, on November 3, 2023, Mayor Adams directed his Chief Counsel to report the suspicious conduct of Ms. Abbasova to DOI with the knowledge that the information would be shared with your office. That same day, the Mayor issued the following statement:

I am outraged and angry if anyone attempted to use the campaign to manipulate our democracy and defraud our campaign. I want to be clear, I have no knowledge, direct or otherwise, of any improper fundraising activity—and certainly not of any foreign money. We will of course work with officials to respond to inquiries, as appropriate—as we always have.

During our first meeting with the office in November 2023, we expressed our concern about the negative impact leaks about the investigation could have for all relevant parties and our desire to engage with the office privately. Over the past nine months, the Mayor has always been respectful of your investigation in public. And in private, we have reiterated our concerns about leaks on multiple occasions and requested any information about the office's theory of prosecution so that we could address it.

We did not receive any substantive response until June 13, 2024, more than seven months into the overt stage of the investigation. On that date, the office asked us to provide a presentation on a list of specific topics, which included the Campaign's knowledge of straw donations and foreign donations, the Mayor's travel to Turkey and the Mayor's relationship with the Turkish Consulate. On June 28, we made the presentation, which included, among other things, a description of the categories of exculpatory evidence listed above and a list of exculpatory witnesses whom the office had not yet interviewed.

The office's response to the June 28 meeting has left us extremely concerned. Since the meeting, multiple subpoenas have been issued, including a subpoena to City Hall. Based on the engagement immediately following the June 28 meeting, we expected the document demands in the subpoenas to track the areas that the office had identified as priorities in advance of the meeting. They did not. To the contrary, they appear to us to reflect new lines of inquiry, which appear unwarranted and without evidentiary basis given our understanding of the facts. The new document demands now seek information about a range of topics, including:

- All documents containing advice or recommendations, excluding legal

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advice, concerning the interactions between the Mayor and the following nations (including their representatives, officers, or employees): Israel, China, Qatar, Turkey, South Korea, and Uzbekistan, as well as groups associated, formally or informally, with those nations.

- All versions of all schedules and calendars the Mayor has used for any purpose – official, campaign and private – since January 1, 2015; and
- All documents concerning any gift to Eric Adams, the Borough of Brooklyn, or the City of New York – other than gifts from family members or persons with whom the Mayor shares a residence.

These topics have never been mentioned over the past nine months, including at our June 28 meeting. Without providing any explanation or facts suggesting there is anything remotely concerning about the Mayor's relationships with Israel, China, Qatar, South Korea and Uzbekistan, the office now demands effectively all documents relating to every official and personal interaction he has ever had with any representative of those countries.

In the same request, the office demands the same materials as to any groups "associated" in any way with those countries. As an example, by its plain meaning, this demand would require production of every strategic communication the Mayor has had with anyone, whether inside or outside his campaign team, about any group "associated" with Israel regarding any topic.

In addition, the demand for all his private calendars over the past nine years without any limitation is intrusive and troubling. Finally, the demand relating to gifts seeks all documents, which would include emails and text messages, about every gift he has ever received from a non-relative over the course of his life.

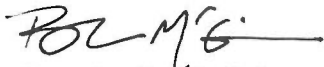
We continue to believe that this investigation is being conducted based on the facts and the law, as it should be. But as Attorney General Garland noted in his 2022 memo on "Election Year Sensitivities," even the appearance that an election-related investigation is motivated by an improper purpose must be avoided. *See* May 25, 2022 Garland Memo at 1. This is so because such a perception in this context can cause irreversible damage to the electoral process even if the underlying purpose of the investigation is sound. At the nine-month mark of this investigation, the continuing and damaging disclosure of confidential grand jury information, the public seizure of the Mayor's devices, the breadth of the recently-issued subpoenas, the exculpatory evidence we have identified, and the unwillingness to engage with us on a theory of federal prosecution as to the Mayor or the prevention of further leaks have unnecessarily combined to significantly increase the risk of a perceived improper purpose in this matter.

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For the reasons stated above, we renew our request for confirmation that the office is investigating any unauthorized public disclosures of information concerning this investigation and taking appropriate measures to prevent any further disclosures. We also renew our request for information regarding your theory of federal prosecution of the Mayor, which remains unknown to us and is unsupported by the facts.

Sincerely,



Brendan R. McGuire
Boyd M. Johnson III

cc: Edward Kim
Daniel Gitner
Robert Sobelman
Lara Pomerantz
Celia Cohen
Andrew Rohrbach
Hagan Scotten
Derek Wikstrom